

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

Santander Bank, N.A.,

Plaintiff,

v.

Empyrean Auto Group, LLC,  
Basin Subaru, LLC, Ronald J.  
Lillard, and Pete Martinez, Jr.,

Defendants.

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Case No: 2:19-cv-00088-DSM

**AFFIDAVIT OF STEPHANIE H. COOK**

STATE OF TEXAS §

COUNTY OF TRAVIS §

Before me, the undersigned notary, on this day personally appeared Stephanie H. Cook, the affiant, a person whose identity is known to me. After I administered an oath, affiant testified as follows:

“My name is Stephanie H. Cook and I am over the age of eighteen years, of sound mind, capable of making this affidavit, and I am fully competent to testify to the matters stated herein. The facts stated in this affidavit are within my personal knowledge and are true and correct.

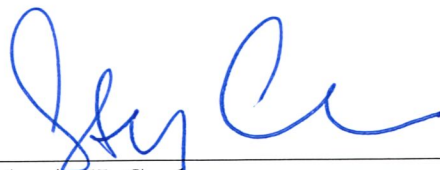
I am a licensed attorney in the State of Texas with over twenty years of legal experience. I am employed by the law firm of Cokinos | Young. Plaintiff Santander Bank, N.A. retained me to represent it in this suit to recover for breach of contract and defaults under lending agreements. I have personal knowledge of this case and the work performed by Cokinos | Young.

I am (1) qualified by education, experience, and training to perform the services required, (2) have knowledge of the legal system, principles, and procedures, (3) performed tasks that are traditionally done by an attorney, and (4) performed services that were reasonable and necessary.

I have reviewed my firm's billing records, which document the time spent to prosecute the lawsuit, participate in discovery and proposed resolutions, and prepare the summary judgment. In total, I or an associate or paralegal, at my direction, have spent 99 hours at \$325.00, or lesser, for such work. Therefore, the total reasonable attorneys' fees incurred by Santander in connection with its lawsuit are \$166,345.00 in billed and unbilled time, plus costs in the amount of \$7,295.62, for a total of \$173,640.62, as of February 28, 2020. In addition, the total reasonable estimated fees and costs not yet billed for preparation and attending the hearing on the Motion for Summary Judgment in this matter are \$6,000. Santander will provide redacted fee statements.

I am familiar with the rates charged by professionals in Texas, including Nueces County and Midland County, and it is my opinion that the attorneys' fees listed above are reasonable. It is my opinion that each of the actions taken on behalf of Santander, as well as the attorneys' fees charged in this case, are reasonable. In forming this opinion, I have considered the standards for reasonableness of attorneys' fees stated in Texas jurisprudence, Rule 1.04 of the Texas Disciplinary Rules of Professional Conduct and I have considered the usual and customary charges made for the services of attorneys and paralegals of comparable education, experience, and qualifications in Nueces County and Midland County.

Further, affiant sayeth not."



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Stephanie H. Cook

SWORN TO and SUBSCRIBED to me by Stephanie H. Cook on March \_\_\_\_, 2020

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Notary Public in and for the State of Texas